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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of)
)
 Implementation of the) CC Docket No. 96-98
 Local Competition Provisions)
 in the Telecommunications)
 Act of 1996)

Reply Comments of USTN Services, Inc.

USTN Services, Inc. ("USTN"),¹ by counsel, hereby submits its Reply to the comments filed in response to the April 19, 1996 Notice of Proposed Rulemaking issued by the Federal Communications Commission ("Commission") in the above-captioned proceeding.² Upon its review of the comments submitted in this proceeding, USTN believes it appropriate to emphasize the importance of establishing national guidelines for the interconnectivity of SS7 and database services, which are essentially interstate services. In support thereof, USTN shows the following:

USTN is owned by more than 250 Independent Telephone Companies ("Independents"). It provides a wide variety of services to over 1000 Independents nationwide, including the Independent Signalling System No. 7 ("SS7") network and related database services, calling card billing validation services, 800 RESPORG services and revenue administration and other related database services.

¹ USTN is doing business as U.S. Intelco Networks and Independent Telecommunications Network.

² In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Notice of Proposed Rulemaking, CC Docket No. 96-98, FCC 96-182, released April 19, 1996 ("NPRM").

USTN has a vital interest in ensuring the interconnectivity of all SS7 networks and data bases with those of the larger Regional Bell Operating Companies ("RBOCs"). Open access and interconnection to the underlying SS7 networks of the RBOCs is the necessary prerequisite to promote the development and utility of competitive SS7 and database services. Interconnection of all networks with the RBOCs' systems is necessary to ensure access to the underlying database information required for call set-up and routing. In the absence of unbundled access to major databases, competing SS7 providers like USTN are placed at a competitive disadvantage. In light of these concerns, USTN limits its reply comments to only the SS7-related interconnection arrangements with the RBOCs.

As formally recognized by the Communications Act of 1934, as amended (the "Act"), the areas where rural telephone companies' provide exchange access service present unique and diverse challenges that require distinctive treatment for interconnection purposes.⁴ As the Commission also recognizes, interconnection issues related to rural telephone companies and telephone companies serving less than two percent of the nationwide subscribers lines⁵ are properly decided by the appropriate State Commission under Section 251 of the Act.⁶ This tentative conclusion properly is

³ See 47 U.S.C. § 153(47).

⁴ See 47 U.S.C. § 251(f)(1).

⁵ See 47 U.S.C. § 251(f)(2).

⁶ See NPRM at para. 261.

based on the fact that the service area and universal service concerns raised by the non-RBOC service areas require local solutions that a nationwide mandate may be too inflexible to address.

These concerns are not, however, applicable with respect to the RBOCs, who are competing currently at the regional market level, and, presumably, if the in-region, interLATA market restriction is lifted, will be competing in nationwide markets. Furthermore, the essentially interstate character of SS7 networks and data base services provide the foundation for federal directives in this area.

As the Commission is aware, the development of the underlying SS7 networks, and the development of related nationwide databases, have provided a variety of new service possibilities.⁷ USTN notes also the reliance on database applications for new services, such as number portability and caller name identification, as well as other potential applications arising from the transition of the current network to an Advanced Intelligent Network platform. To encourage the development of these and other types of applications, a national unbundling policy applicable to the RBOCs should be established by the Commission to guide the states' implementation proceedings. USTN is also concerned that, in the absence of a

⁷ See, e.g., In the Matter of Rules and Policies Regarding Calling Number Identification Service -- Caller ID, Order and Fourth Notice of Proposed Rulemaking, CC Docket No. 91-281, FCC 95-480, released December 1, 1996, Order, CC Docket No. 91-281, DA 95-2415, released December 7, 1995; see also In the Matter of Provision of Access for 800 Services, Memorandum Opinion and Order, CC Docket No. 86-10, 4 FCC Rcd 2824 (1989).

specific national unbundling policy applicable to the RBOCs, the development of competitive alternatives for nationwide and regionalized underlying SS7 and database-related services may be undermined.

Accordingly, in light of the Act's directives that RBOCs be treated differently from other local exchange companies,⁸ USTN submits that the Commission should make clear its expectation that Section 251(c)(3) will require full unbundling of access to and elements of the RBOCs' SS7 networks and database offerings. Because the details of the specific unbundling requests implemented through the negotiation process should be left to the State Commissions (as directed under the Act),⁹ this approach is entirely consistent with legislative intent¹⁰ and would ensure the prompt and efficient implementation of the negotiations contemplated by the Act.¹¹

⁸ See, e.g., 47 U.S.C. § 271.

⁹ See 47 U.S.C. §§ 252(a)(2) and 252(b).

¹⁰ Section 153(45) specifically includes "databases" and "signalling systems" as identified "network elements" within Section 251(c)(3). See 47 U.S.C. § 153(45) ("The term 'network element' . . . includes features, functions, and capabilities that are provided by means of such facility or equipment, including . . . databases, signaling systems"); see also 47 U.S.C. § 251(c)(3). Section 271, addressing the timing of in-region, interLATA services by RBOCs, reflects this same policy. As one element of the "competitive checklist" established to gauge an RBOCs eligibility to provide in-region interLATA service in a state, the RBOCs must provide "[n]ondiscriminatory access to databases and associated signalling necessary for call routing and completion." 47 U.S.C. § 271(c)(2)(B)(x). Read together, these sections clearly support the conclusion that fully unbundled access to the RBOC network would further the public interest.

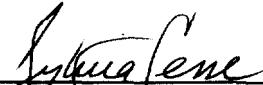
¹¹ See 47 U.S.C. § 252.

To foster competition in the provision of interstate SS7 and database services, USTN respectfully submits that the Commission should establish a clear national policy of full competitive access to the unbundled elements of RBOC SS7 networks and databases requested herein. In USTN's view, this policy will ensure connectivity in a manner tailored to the specific needs of the SS7 network or customer on whose behalf the request is made.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Nicola A. Chenosky, of Kraskin & Lesse, hereby certify that a copy of the forgoing Reply Comments of USTN Services, Inc. (*CC Docket No. 96-98*) was served on this 30th day of May 1996, by first class, U.S. mail, postage prepaid, to the parties on the attached pages.


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